

February 19, 2016

Mr. Paul Rosasco, P.E.  
Engineering Management Support, Inc.  
7220 West Jefferson Avenue, Suite 406  
Lakewood, CO 80235

RE: Framework for an Incident Management Plan West Lake Landfill Operable Unit 1,  
Bridgeton, Missouri, dated December 28, 2015.

Dear Mr. Rosasco:

The US Environmental Protection Agency (EPA) is providing comments (see attachment to this letter) on the document dated December 28th, 2015, "Framework for an Incident Management Plan West Lake Landfill Operable Unit 1, Bridgeton, Missouri" (IMP Framework) prepared by Engineering Management Support Inc. (EMSI).

Please take these comments into consideration as you proceed with the development of an Incident Management Plan (IMP) for OU-1, as required by paragraph 34b of the December 9, 2015 Unilateral Administrative Order for Removal Action at the West Lake Landfill Superfund Site, EPA Docket No. CERCLA-07-2016-002. Please submit the IMP draft document within 30 days if your receipt of this letter.

If you have any questions pertaining to this letter, please contact me by phone at (913) 551-7611; by written correspondence to my attention at the EPA, 11201 Renner Boulevard, Lenexa, Kansas 66219; or email to vann.brad@epa.gov.

Sincerely,

Tom Mahler  
On-Scene Coordinator

## COMMENTS SECTION:

### Administrative Comments:

1. General comment. EPA agrees with the submitted IMP framework document in that the existing Bridgeton IMP should be revised, expanded upon, improved, and updated to include all West Lake site areas.

### Specific Comments:

2. From bullets provided in Section 2 of the IMP framework on page 2; in the pending IMP document please provide clear language that differentiates between the site activities of “Generation, storage and treatment of leachate” from “Collection and disposal of landfill leachate”.
3. Section 3. In the pending IMP please ensure that the buffer zone is identified as an area of OU-1 that will be covered by the provisions of the IMP.
4. Section 3, subpart 1. Please specify how the “24/7 inspection and monitoring program will allow continuous observation of Area 1 and Area 2. EPA maintains that electronic surveillance is an appropriate measure to be used to help ensure continuous observation of the radiation areas.
5. Section 3, subpart 5. Please clarify in the text of the pending IMP that the manager and technician (and any other responders) will be qualified to respond to emergencies at or in the on-site radiation areas.
6. Section 4 - Schedule. In the pending IMP, please include time frames and any other appropriate details related to plans to continue to hold additional First Responder meetings.